

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 20 1987

Dr. James R. Campbell, Ph.D.
Program Manager, Previously Owned Properties
Keystone Environmental Services, Inc.
436 Seventh Avenue, Suite 1940
Pittsburgh, PA 15219

Re: Administrative Order on Consent Docket No. CERCLA VI-8-85
South Cavalcade

Dear Dr. Campbell:

I am writing you in regards to the work schedule at the South Cavalcade site. As you are acutely aware, there have been several unforeseen circumstances which have delayed progress at this site. The major of these have been:

1. Access problems with HB&T,
2. Unsuccessful attempts to find the 552' well,
3. Problems in drilling the 200' well,
4. Necessary offsite monitoring, and
5. Access problems for offsite monitoring.

EPA recognizes that Koppers and Keystone have diligently strived to overcome these obstacles and to meet to their best ability the stated schedule of the Administrative Order. We have verbally agreed to all additional work, and have accepted the causes for delays under Section XIV of the Administrative Order.

Given all the delays, I feel that it is now necessary to formalize the reworked project schedule including the supplemental field work. Therefore, you should submit to Region 6 for our review a proposed revised work schedule. I understand Shannon Craig of your staff has been working on this schedule with Jim Pendergast of my staff. This schedule, after we agree to it, will serve as the measure to determine compliance under Section VI.A of the Administrative Order.

In addition, EPA is now approving by this letter the supplemental work to be conducted offsite starting the end of July. This work, which was discussed at the April 21 meeting, includes:

1. Installation of wells to monitor the shallow ground water in areas A and B as depicted in your May 8 letter.
2. Installation of wells to monitor the intermediate ground water in areas C and D as depicted in your May 8 letter, provided that access is granted, and

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3. Ground water monitoring of the new wells commencing at least 30 days following the installation, with one round of sampling if clean and two otherwise.

Jim Pendergast has been working on obtaining site access for your field crews; we should be able to get access in area D by late July and perhaps also in area C. We have received verbal permission for access in sites 3, 5, and 6 (areas A and B). You need to contact the homeowners to schedule the dates of well drilling.

Finally, in response to your May 8 letter, I agree that it is an excellent idea to coordinate the water level sampling between the North and South Cavalcade sites. However CDM has finished the field work at the North Cavalcade site.

Should you have any questions about these issues, please contact Jim Pendergast at (214) 655-6735.

Sincerely yours,

Larry D. Wright, Chief
Superfund Enforcement Section

cc: D. Sorrells, TWC
L. Mays, CDM

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